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feiture of the case, and from repossessing itself of the premises. The circuit court found that the lessee was in arrears for a certain amount, and decreed that, on payment of such amount within 10 days, the temporary injunction theretofore issued should be made perpetual, and that on default it should stand dissolved. On appeal, the appellate court reversed that part of the decree requiring payment of such amount, and made the injunction perpetual unconditionally. The Supreme Court, in effect, reversed this decree and affirmed the circuit court; the only difference in the decree directed by the Supreme Court and the original decree of the circuit court being that the time within which the payment was to be made was changed from 10 days to 30 days. On reinstatement of the cause in the circuit court, it rendered a decree following the direction of the Supreme Court. On a second appeal, it was contended that there was error in the decree of the circuit court. In reference to this question, the Supreme Court says in *Chicago Railway Equipment Co. v. National Hollow Brake-Beam Co.*, 87 *Northeastern Reporter*, 872, that a decree entered in accordance with its directions cannot be erroneous; that it may err in its directions to an inferior court, but, however erroneous the directions given may be, it is the duty of that court to strictly follow the directions contained in the mandate. The only question, therefore, which was open to consideration on the second appeal, was whether the decree of the circuit court was in accordance with the mandate of the Supreme Court.

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**Power of Congress to Punish for Harboring Immoral Alien Women.**

—The power of Congress to punish the offense of harboring for immoral purposes an alien woman within three years of her entrance of the United States was the question presented in *Keller v. United States*, 29 *Supreme Court Reporter*, 470. The woman whom defendant was indicted for harboring was merely furnished by him with a place to follow her degraded calling. The Federal Supreme Court held that such regulations were solely within the power of the states, and that for Congress to attempt such legislation in the exercise of a police power would bring us face to face with such a change in the internal conditions of our country as was never dreamed of by the framers of the Constitution.

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**Right to Withdraw Request for Divorce.**—A husband filed a complaint in divorce against his wife, who thereupon filed an answer and a cross-complaint charging him with violation of his marriage obligation, but not praying for a divorce. The jury having found both parties guilty of extreme cruelty, one of the attorneys remarked to another, in their presence, that a verdict had been secured which prevented the granting of a divorce. Thereupon one of the jurors said that it was not his intention to render such a verdict. The jury was